

**UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND**

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INTERNATIONAL UNION, SECURITY,  
POLICE AND FIRE PROFESSIONALS  
OF AMERICA, et al.  
Plaintiffs,

v.

BOGUES, et al.  
jointly and severally, Defendants.

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) Civil Action No.: 1:09-cv-03136-ccb  
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**CONSENT MOTION TO FURTHER MODIFY THE SUMMARY JUDGMENT  
BRIEFING SCHEDULE**

1. On January 9, 2012, Plaintiffs filed a Motion for Summary Judgment. Defendants filed their Opposition Brief on March 14, 2012. The Court granted Plaintiff an extension to file their Reply Brief until today, April 6, 2012.

2. In the last several weeks the parties have pursued settlement. The last discussion between counsel was yesterday evening (April 5, 2012). That discussion resulted in the parties reaching a settlement payment figure and suggests that they will reach full settlement as they attempt to work out the remaining settlement details. The parties intend to attempt to finalize a settlement within the next two weeks.

3. As a consequence, Plaintiffs' have sought and secured the consent of Defendants to seek the Court's approval to further modify the briefing schedule so that further work and effort on the Reply Brief will not need to be expended unless settlement is not achieved.

4. For the reasons set forth herein, Plaintiffs' seek until April 20, 2012 to file their Reply Brief.

5. A proposed Order is attached.

Dated: April 6, 2012

Respectfully submitted,

/s/ Scott A. Brooks

(MI Bar #P35773)

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### **CERTIFICATE OF SERVICE**

I certify that the Consent Motion to Further Modify the Scheduling Order was sent to Defendants' counsel by CM/ECF on April 6, 2012.

/s/ Scott A. Brooks

Scott A. Brooks

